



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

March 24, 2023

VIA ECF

Hon. Jennifer H. Rearden  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007



**Re: *Page, et al. v. Jaddou, et al.*, No. 23 Civ. 00254 (JHR)**

Dear Judge Rearden:

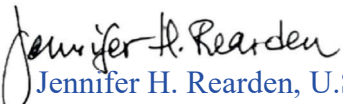
This Office represents defendants (the “government”) in the above-referenced action in which the plaintiffs seek an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate an Application to Adjust Status (Form I-485). I write respectfully, and jointly with the plaintiffs, to request a 120-day stay of this matter, from March 31, 2023, to July 31, 2023.

On March 16, 2023, USCIS issued the plaintiffs a Request for Evidence, seeking missing evidence required to process the Form I-485. The plaintiffs have until June 12, 2023 to submit a response, and once received, USCIS requires time to review the plaintiffs’ response and adjudicate the application. The parties may be able to resolve this matter without further intervention of the Court. Accordingly, the requested stay is in the interests of efficiency and conservation of judicial and party resources. *See Landis v. North Am. Co.*, 299 U.S. 248, 254-55 (1936) (a district court has the “inherent power” to stay a pending action in the interest of judicial economy).

This is the parties’ first request for a stay. The parties further propose providing a joint status update or stipulation and proposed order of dismissal by July 31, 2023.

I thank the Court for its consideration of this letter.

SO ORDERED.

  
Jennifer H. Rearden, U.S.D.J.  
Date: March 28, 2023

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: s/ Nancy Pham  
NANCY D. PHAM  
Special Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (202) 305-8062  
E-mail: nancy.pham3@usdoj.gov  
*Attorney for Defendants*

cc: Counsel of record (via ECF)